

Joanne T. Blackburn, WSBA No. 21541
 Natalia Smirnova, WSBA No. 55110
 ROPERS MAJESKI PC
 1420 5th Ave #2200
 Seattle, Washington 98101
 Telephone: 206.316.9167
 joanne.blackburn@ropers.com
 natalia.smirnova@ropers.com
 Counsel for Defendants FOREMOST
 INSURANCE COMPANY GRAND
 RAPIDS, MICHIGAN

Honorable Judge Barbara J. Rothstein

UNITED STATES DISTRICT COURT
 FOR THE WESTERN DISTRICT OF WASHINGTON
 AT SEATTLE

VINETA and MICHAEL GALLOGLY, a
 marital community,

Plaintiffs,

v.

FOREMOST INSURANCE COMPANY
 GRAND RAPIDS, MICHIGAN, a Michigan
 corporation,

Defendant.

Case No. 2:24-cv-00817-BJR

STIPULATED MOTION AND
 ORDER EXTENDING DISCOVERY
 DEADLINES

I. STIPULATED MOTION

The parties in this matter stipulate and agree to move the Court for an Order modifying the Court's case scheduling order (Dkt. No. 10).

A scheduling order may be modified "for good cause and with the judge's consent." Fed. R. Civ. P. 16(b)(4). Good cause exists for the requested continuance.

This request is necessitated by delays in the testing of several ruptured pipes, pipe connectors and the BackerBoard behind the shower, which are critical pieces of evidence in this matter. The testing is taking longer than initially anticipated and both parties agree that this testing is essential to advancing towards a resolution of this matter.

Accordingly, pursuant to the agreement between the parties, the undersigned counsel for Plaintiff and Defendant respectfully request that the Court extend certain deadlines in this case as follows:

Reports from expert witness under FRCP 26(a)(2): From December 31, 2024 to January 31, 2025

Completion of Fact Discovery: From January 10, 2025 to February 14, 2025

Completion of Expert Discovery: From January 31, 2025 to February 14, 2025

Both parties have agreed that an extension of the deadlines is appropriate and necessary, as these tests, will assist in resolving the matter efficiently. Moreover, both parties have agreed that their experts and fact witnesses need the test results to provide opinions on when the leak first started. Finally, the parties are scheduling a mediation for the time period after the test results will be provided, in an attempt to resolve this case short of incurring the expenses of extensive discovery and trial.

ROPERS MAJESKI PC

Dated: January 2, 2025

By: _____

JOANNE T. BLACKBURN
joanne.blackburn@ropers.com
WSBA No. 21541
NATALIA A. SMIRNOVA
natalia.smirnova@ropers.com
WSBA No. 55110
Counsel for Defendant FOREMOST
INSURANCE COMPANY GRAND
RAPIDS, MICHIGAN

LAW OFFICE OF WILLIAM E. PIERSON,
JR. | PC

By: _____

William E. Pierson, Jr., WSBA No. 13619
Counsel for Plaintiffs VINETA and
MICHAEL GALLOGLY

II. ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Discover deadlines are modified as follows:

Reports from expert witness under FRCP 26(a)(2): From December 31, 2024 to January 31, 2025

Completion of Fact Discovery: From January 10, 2025 to February 14, 2025

Completion of Expert Discovery: From January 31, 2025 to February 14, 2025.

DATED: 2nd January 2025.



Hon. Barbara J. Rothstein
United States District Court Judge